| 1<br>2<br>3<br>4<br>5<br>6 | RICHARD A. WRIGHT, ESQUIRE Nevada Bar No. 886 RUSSELL E. MARSH Nevada Bar No. 11198 WRIGHT MARSH & LEVY 300 S. Fourth Street Suite 701 Las Vegas, NV 89101 (702) 382-4004 (702) 382-4800 (Fax) rick@wmllawlv.com Attorneys for Defendant Bradford |  |  |  |  |
|----------------------------|---|--|--|--|--|
| 7                          |   |  |  |  |  |
| 8                          | UNITED STATES DISTRICT COURT  |  |  |  |  |
| 10                         |   |  |  |  |  |
| 11                         | UNITED STATES OF AMERICA, )   |  |  |  |  |
| 12                         | ) CASE NO. 2:19-CR-000222-KJD-BNW   |  |  |  |  |
| 13                         | vs. )   |  |  |  |  |
| 14                         | LANCE K. BRADFORD, )  |  |  |  |  |
| 15                         | Defendant,  |  |  |  |  |
| 16<br>17                   | STIPULATION AND ORDER TO ALLOW DEFENDANT BRADFORD TO OBTAIN A PASSPORT AND TRAVEL   |  |  |  |  |
| 18                         | IT IS HEREBY STIPULATED and AGREED by and between the United States of America,   |  |  |  |  |
| 19                         | by and through NICHOLAS TRUTANICH, United States Attorney, and STEVEN W. MYHRE,   |  |  |  |  |
| 20                         | Assistant United States Attorney, and Defendant LANCE K. BRADFORD, by and through his   |  |  |  |  |
| 21                         | counsel, RICHARD A. WRIGHT, ESQUIRE, that the conditions of Mr. Bradford's Pretrial Release   |  |  |  |  |
| 22                         | be modified to allow him to obtain his passport and travel to Caribbean for up to ten days in July  |  |  |  |  |
| 23                         | 2020.   |  |  |  |  |
| 24                         | 1. On September 3, 2019, Mr. Bradford appeared pursuant to a Summons, and was   |  |  |  |  |
| 25                         | released on a PR Bond (ECF No.7). Mr. Bradford was ordered to surrender his passport and his  |  |  |  |  |
| 26                         | travel was restricted to the continental U.S. unless approved by Pretrial Services (Id. at 3).  |  |  |  |  |
| 27                         | 2, Mr. Bradford's trial in this matter is currently set for November 16, 2020. (ECF No.   |  |  |  |  |
| 28                         | 17).  |  |  |  |  |

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| 1  | 3. Mr. Bradford requests to travel to the Caribbean in 2020. He will need to retrieve his            |                                      |  |  |
|----|--|--------------------------------------|--|--|
| 2  | passport to travel out of the country.   |                                      |  |  |
| 3  | 4.   | The parties agree that the condition | ons of Mr. Bradford's pretrial release be modified |  |
| 4  | to allow him to obtain his passport and travel. Mr. Bradford is currently scheduled to travel to the |                                      |  |  |
| 5  | Bahamas from July 7-14, 2020. Mr. Bradford requests access to his passport for those dates. He will  |                                      |  |  |
| 6  | return the passport to U.S. Pretrial Services when he returns to the United States.                  |                                      |  |  |
| 7  | 5. Pretrial Services agrees with these changes in Mr. Bradford's conditions of release.              |                                      |  |  |
| 8  | Mr. Bradford's Pretrial Services Officer Jessie Moorehead has reviewed and approved this             |                                      |  |  |
| 9  | stipulation and Order.   |                                      |  |  |
| 10 | 6.   | The parties agree that all other co  | onditions of Mr. Bradford's release will remain in |  |
| 11 | full force and effect.   |                                      |  |  |
| 12 | Dated this 28th day of May, 2020.  |                                      |  |  |
| 13 |  |                                      | Respectfully submitted,                            |  |
| 14 | WRIGHT M   | ARSH & LEVY                          | NICHOLAS TRUTANICH                                 |  |
| 15 |  |                                      | UNITED STATES ATTORNEY                             |  |
| 16 |  | sell E. Marsh                        | BY /s/ Steven W. Myhre                             |  |
| 17 | RUSSELL E. MARSH, ESQUIRE<br>Attorneys for Defendant Bradford  |                                      | STEVEN W. MYHRE<br>Assistant U.S. Attorney         |  |
| 18 |  |                                      |  |  |
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|    |  |                                      |  |  |

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| 1 2                        | UNITED STATES DISTRICT COURT<br>DISTRICT OF NEVADA                                     |  |  |  |
|----------------------------|--|--|--|--|
| 3<br>4<br>5<br>6<br>7<br>8 | UNITED STATES OF AMERICA,  Plaintiff,  vs.  LANCE K. BRADFORD,  Defendant,  Defendant, |  |  |  |
| 9                          |  |  |  |  |
| 10                         | ORDER  |  |  |  |
| 11                         | Based on the Stipulation between the Defendant, Lance K. Bradford and the Government,  |  |  |  |
| 12                         | through counsel, and good cause appearing,   |  |  |  |
| 13                         | IT IS HEREBY ORDERED that the conditions of Defendant Bradford's pretrial release      |  |  |  |
| 14                         | be modified as follows:  |  |  |  |
| 15                         | 1. Mr. Bradford may travel to the Caribbean for up to ten days in July 2020.           |  |  |  |
| 16                         | 2. Mr. Bradford will obtain his passport from U.S. Pretrial Services within one week   |  |  |  |
| 17                         | prior to his travel. U.S. Pretrial Services will provide the passport to him for the   |  |  |  |
| 18                         | purpose of this travel. Mr. Bradford will provide his passport to Pretrial Services    |  |  |  |
| 19                         | within two business days of his return to the United States.                           |  |  |  |
| 20                         | 3. All other conditions of Pretrial Supervision remain in effect.                      |  |  |  |
| 21                         | IT IS SO ORDERED.  |  |  |  |
| 22                         | Dated: May 29, 2020  |  |  |  |
| 23                         | 2 ,00 ,0   |  |  |  |
| 24                         | layra J. Louchat   |  |  |  |
| 25                         | UNITED STATES MAGISTRATE JUDGE   |  |  |  |
| 26                         |  |  |  |  |
| 27                         |  |  |  |  |
| 28                         |  |  |  |  |
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